

EC-2000-007
IV-D-052



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To: docket.oeca@epamail.epa.gov
CC:
Subject: Re docket number EC-2000-007

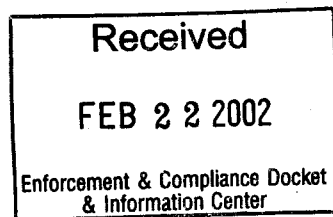
02/22/02 02:49 PM

I wish to submit comments on docket number EC-2000-007 elclectronically. Attached is a WordPerfect 5.X format file that was produced in MS Word. Please let me know if the file does not open correctly. Thank you.

Randy Thater
Process Control Supervisor
City of Waukesha WWTP



(262) 524-3631 ER022202.doc



Docket EC-2000-007

Establishment of Electronic Reporting: Electronic Records; Proposed Rule
Comments from Randall Thater of the City of Waukesha (WI) POTW on the proposed rule.

We applaud the efforts of the EPA to consider the use of electronic technologies for the reporting of NPDES permit data. We understand the need to ensure the security and the legal integrity of the data submitted. We are concerned that the rule goes too far in trying to address these issues. We are especially

In particular the definition from Section 3.3 is:

"Electronic record means any combination of text, graphics, data, audio, pictorial, or other information represented in digital form that is created, modified, maintained, archived, retrieved or distributed by a computer system."

Then under Sec. 3.100 What are the requirements for acceptable electronic records? :

"(2) Maintain all electronic records and electronic documents without alteration for the entirety of the required period of record retention;"

We are a medium sized publicly owned treatment works. We rely on the use of personal computers for intermediate steps such as laboratory calculations, analytical quality records, plant and laboratory data records, and preparation of reports. This is done with standard commercial software such as spreadsheet, word processing, and database applications. These do not seem to meet the needs of the proposed rule in regards to alterations.

The primary data is either paper records or computer-based records using proprietary software that will presumably meet the security requirements. If we should choose to use electronic submittal that should be taken care of by the state delegated program, in their design of the submittal process.

We are concerned that this rule might preclude our use of standard office software for intermediate work product as detailed above. The alternatives to that use would impose a heavy burden on our operation. We would need to abandon the use of electronic devices entirely and revert entirely to paper records. Otherwise, we would need to purchase a high priced specialty software, such as a LIMS system, that would meet the requirements of this rule but not otherwise be a justified expense.

